

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
Case No. 1:21-cv-119-MR**

HOPE SURROGACY, INC.,
)
Plaintiff,
)
v.
)
**CARRYING HOPE SURROGACY,
LLC,**
)
Defendant.
)

**JOINT MOTION FOR ENTRY OF CONSENT PROTECTIVE ORDER
AND ORDER ON DISCOVER OF ELECTRONICALLY STORED
INFORMATION**

NOW COME Plaintiff Hope Surrogacy Inc. and Defendant Carrying Hope Surrogacy, LLC to jointly move the Court, pursuant to Fed. R. Civ. P. 26(c), to enter the attached proposed Consent Protective Order and Order on Discovery of Electronically Stored Information, attached as Exhibits A and B respectively.

In support of this Motion, the parties represent that they have conferred and agreed on the terms of the attached proposed Consent Protective Order and Order on Discovery of Electronically Stored Information, that good cause exists to enter the attached orders, and that counsel for all parties consent to this Motion.

WHEREFORE, Plaintiff and Defendant request that the attached proposed Consent Protective Order and Order on Discover of Electronically Stored

Information be entered by the Court at its earliest convenience.

Respectfully submitted this 25th day of May 2021.

MICHAEL BEST & FRIEDRICH
LLP

By: /s/ *Emily M. Haas*
Emily M. Haas
NC State Bar No. 39716
2501 Blue Ridge Road, Suite 390
Raleigh, NC 27607
Phone: (984) 220-8750
Fax: (877) 398-5240
emhaas@michaelbest.com

Laura Konkel
lmkonkel@michaelbest.com
1 S Pinckney St, Unit 700
Madison, WI 53703
Phone: (608) 257-3501
Fax: (877) 398-5240

*Attorneys for Plaintiff
Hope Surrogacy, Inc.*

WOMBLE BOND DICKINSON
(US) LLP

By: /s/ *Minnie Kim*
Minnie Kim
NC State Bar No. 46178
301 South College St., Suite
3500
Charlotte, NC 28203
Phone: (704) 331-4921
Fax: (704) 338-7821
Minnie.Kim@wbd-us.com

Christopher R. Liro
chris.liro@andruslaw.com
Aaron T. Olejniczak
aaron.o@andruslaw.com
Andrus Intellectual Property
Law LLP
790 North Water Street, Suite
2200
Milwaukee, WI 53202
Phone: (414) 271-7590
Fax: (414) 271-5770

*Attorneys for Defendant
Carrying Hope Surrogacy, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this the 25th day of May 2021 a copy of the foregoing **JOINT MOTION FOR ENTRY OF CONSENT PROTECTIVE ORDER AND ORDER ON DISCOVER OF ELECTRONICALLY STORED INFORMATION** was filed with the Clerk of Court using the CM/ECF system which will send notification to opposing counsel at the following addresses:

Minnie Kim
301 South College St., Suite 3500
Charlotte, NC 28203
Phone: (704) 331-4921
Fax: (704) 338-7821
Minnie.Kim@wbd-us.com

/s/ Emily M. Haas

Attorney for Plaintiff